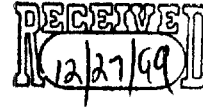




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December 15, 1999



The Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C. Street S.W.  
Washington, DC 20204

Dear Sir/Madam:

This is a notification pursuant to 21 U.S.C. 343(r)(6) that Standard Process Inc., Palmyra, Wisconsin 53156-0904, is making the following statements:

- (1) Echinacea is useful in minimizing the effects that plague people during seasonal changes.
- (2) Rose hip powder has historically been and presently is being used effectively as a tonic, nutrient, and to promote regularity.
- (3) Stimulates immune function.
- (4) Research suggests that Echinacea increases the body's ability to respond to stress. Taken for three to five days at the onset of symptoms, Echinacea appears to lessen the severity and duration of many different kinds of seasonal challenges. Rose hip powder also boosts the body's ability to fight off challenges. The many vitamins found in Rose hip powder have also made it a popular nutritive tonic used to help lessen the effects of fatigue and exhaustion.
- (5) Restores skin integrity.
- (6) Promotes healthy digestive and respiratory function.
- (7) Echinacea can help keep mucous membranes healthy and improve digestion in the stomach, as well as in the small and large intestines. Rose hip powder is used to support healthy respiratory function.
- (8) Keeps the urinary tract healthy.

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- (9) Rose hip powder is useful in helping to maintain healthy bladder and kidney function.
- (10) Collagen C supplies rich sources of the complete vitamin C complex with nutritional food concentrates. Together they support the healthy function of bones, joints, ligaments, and cartilage.

These statements are made for a dietary supplement containing a proprietary blend of echinacea (root), rose hips, veal bone, defatted wheat (germ), bovine adrenal, dried buckwheat (leaf) juice, buckwheat (seed), acerola (berry), and mushroom. Other ingredients include ascorbic acid, honey, and calcium stearate. The name of the product is Collagen C.

The information contained herein is accurate and Standard Process Inc. has substantiation that the statements are truthful and not misleading.

Sincerely yours,

Ann Holden  
Standard Process Inc.

